**Baker & Hostetler LLP** 

45 Rockefeller Plaza

New York, NY 10111

Telephone: (212) 589-4200 Facsimile: (212) 589-4201

David J. Sheehan Keith R. Murphy Hearing Date: December 17, 2014 at 10:00 a.m.

Objection Deadline: December 10, 2014

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff.

v.

ROBERT L. SILVERMAN, WESTPORT NATIONAL BANK, a division of CONNECTICUT COMMUNITY BANK, N.A., and PSCC SERVICES, INC.,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-05418 (SMB)

NOTICE OF MOTION FOR ENTRY OF ORDER PURSUANT TO SECTION 105(a) OF THE BANKRUPTCY CODE AND RULES 2002 AND 9019 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE APPROVING A SETTLEMENT BY AND BETWEEN THE TRUSTEE AND WESTPORT NATIONAL BANK, A DIVISION OF CONNECTICUT COMMUNITY BANK, N.A

08-01789-cgm Doc 8570-1 Filed 11/21/14 Entered 11/21/14 16:53:21 Notice of Motion Pq 2 of 3

PLEASE TAKE NOTICE that Irving H. Picard ("Trustee"), as trustee for the the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. § 78aaa et seq., and the estate of Bernard L. Madoff, by and through the Trustee's undersigned counsel, will move before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at the United States Bankruptcy Court, located in the Alexander Hamilton Customs House, One Bowling Green, New York, New York 10004, at 10:00 a.m. on December 17, 2014, for entry of an Order pursuant to section 105(a) of the Bankruptcy Code (11 U.S.C. § 101 et seq.), and Rules 2002(a)(3) and 9019(a) of the Federal Rules of Bankruptcy Procedure approving a settlement, the terms and conditions of which are set forth in the Settlement Agreement by and between the Trustee and Westport National Bank, a division of Connecticut Community Bank, N.A. ("Motion").

PLEASE TAKE FURTHER NOTICE that written objections to the Motion must be filed with the Clerk of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004 by no later than December 10, 2014 (with a courtesy copy delivered to the Chambers of the Honorable Stuart M. Bernstein and must be served upon (a) Baker & Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: Keith R. Murphy and (b) Willkie Farr & Gallagher LLP, 787 Seventh Avenue, New York, New York, 10019, Attn: Todd G. Consenza. Any objections must specifically state the interest that the objecting party has in these proceedings and the specific basis of any objection to the Motion.

**PLEASE TAKE FURTHER NOTICE** that failure to file timely objections may result in the entry of an order granting the relief requested in the Motion without further notice to any party or an opportunity to be heard.

Dated: November 21, 2014 New York, NY Respectfully submitted,

/s/ Keith R. Murphy

Baker & Hostetler LLP
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
dsheehan@bakerlaw.com
Keith R. Murphy
kmurphy@bakerlaw.com

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the estate of Bernard L. Madoff